

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors.<sup>1</sup>

PROMESA Title III

Case No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

PROMESA Title III

Case No. 17 BK 4780-LTS

(This court filing relates only to  
Case No. 17 BK 4780-LTS)

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

NATIONAL PUBLIC FINANCE GUARANTEE CORPORATION, ASSURED GUARANTY CORP., ASSURED GUARANTY MUNICIPAL CORP., and SYNCORA GUARANTEE INC.,

Movants,

v.

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*, and PUERTO RICO ELECTRIC POWER AUTHORITY,

Respondents.

NATIONAL PUBLIC FINANCE GUARANTEE CORPORATION,

Movants on the Motion to Compel,

v.

CITIGROUP GLOBAL MARKETS INC.,

Respondents on the Motion to Compel.

**NOTICE OF URGENT MOTION OF NATIONAL PUBLIC FINANCE GUARANTEE CORPORATION TO COMPEL PRODUCTION OF DOCUMENTS, A CATEGORICAL PRIVILEGE LOG, AND OTHER RELIEF FROM CITIGROUP GLOBAL MARKETS INC.**

**PLEASE TAKE NOTICE** that on March 28, 2019, National Public Finance Guarantee Corporation (“National”), as party to the Motion by National, Assured Guaranty Corp., Assured Guaranty Municipal Corp., and Syncora Guarantee Inc. for relief from the Automatic Stay to Allow Movants to Enforce Their Statutory Right to Have a Receiver Appointed, ECF No. 975 (the

“Lift Stay Motion”), shall appear before the Honorable Judge Judith G. Dein, Magistrate Judge, and shall urgently move this Court to compel production of documents, a categorical privilege log, and other relief from Citigroup Global Markets Inc. (the “Urgent Motion”) in response to National’s Subpoena for the Production of Documents to Citigroup, which seeks documents relevant to the Lift Stay Motion.

**PLEASE TAKE FURTHER NOTICE** that any responses or objections (“Objections”) to the Urgent Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the District of Puerto Rico, and the *Order Further Amending Case Management Procedures* (Case No. 17-03283-LTS; ECF No. 3804) (the “Case Management Order”); shall be filed with the Court (a) by attorneys practicing in the District Court, including attorneys admitted *pro hac vice*, electronically in accordance with rule 5 of the Local Civil Rules for the District of Puerto Rico, and (b) by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF), to the extent applicable; and shall be served on counsel for National Public Finance Guarantee Corporation, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Jonathan Polkes and Marcia Goldstein) and Adsuar Muñoz Goyco Seda & Pérez-Ochoa, PSC, 208 Ponce de Leon Ave., Suite 1600, San Juan, Puerto Rico 00936 (Attn: Eric Pérez-Ochoa);

**PLEASE TAKE FURTHER NOTICE** that if an Objection to the Urgent Motion is not received by the Objection Deadline, the relief requested shall be deemed unopposed, and the District Court may enter an order granting the relief sought without a hearing pursuant to the Case Management Order.

**CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 9013-1 AND THE  
SEVENTH AMENDED CASE MANAGEMENT PROCEDURES**

Pursuant to Local Rule 9013-1 and ¶ I.H of the Seventh Amended Case Management Order, National hereby certifies that it has (a) carefully examined the matter and concluded that there is a true need for an urgent hearing; (b) not created the urgency through any lack of due diligence; (c) made a bona fide effort to resolve the matter without a hearing; (d) made reasonable, good-faith communications in an effort to resolve or narrow the issues that are being brought to the Court; and (e) contacted counsel for Citigroup and the Federal Oversight and Management Board for Puerto Rico, who have rejected National's requests for the productions and other relief National now seeks by virtue of this Urgent Motion.

*[Remainder of page intentionally left blank]*

Dated: March 28, 2019  
San Juan, Puerto Rico

**ADSUAR MUNIZ GOYCO SEDA & PEREZ-  
OCHOA PSC**

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Guarantee Corp.*

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 28, 2019 I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the District of Puerto Rico by using the CM/ECF system, which sent notification of such filing to all CM/ECF participants. Further, I transmitted notification and a copy of such filing to counsel for Citigroup Global Markets Inc. via electronic mail.

At New York, New York, this 28th day of March, 2019.

By: /s/ Robert Berezin

Robert Berezin\*

\* Admitted *pro hac vice*